

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TOBIAS MOELLER-BERTRAM,)	
individually, and on behalf of all others)	
similarly situated,)	Case No. 1:23-cv-02027
)	
Plaintiff,)	Hon. Lewis J. Liman
)	
v.)	
)	
GEMINI TRUST COMPANY, LLC; and)	
DIGITAL CURRENCY GROUP, INC.)	
)	
Defendants.)	
)	
)	

**DECLARATION OF JOOYUN KIM IN SUPPORT OF
PLAINTIFF'S MOTION TO REMAND TO STATE COURT**

I, JOOYUN KIM, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner at the law firm HGT Law, 250 Park Avenue, Seventh Floor, New York, New York 10177, counsel for Plaintiff Tobias Moeller-Bertram, individually, and on behalf of all others similarly situated. I submit this declaration in support of Plaintiff's Motion to Remand To State Court.

2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff's Complaint for Violation of the Federal Securities Laws, filed on February 22, 2023 in the Supreme Court of the State of New York, County of New York, under the case caption *Tobias Moeler-Betram v. Gemini Trust Company, LLC, et al.*, Index No. 151710/2023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of April 2023.

/s/ JooYun Kim
JooYun Kim